

DELIVERED ELECTRONICALLY

January 20, 2022

Ms. Jessica Dibiasio, Compliance and Quality Manager
Ascension Recovery Services
103 Corporate Drive, Suite 102
Morgantown, WV 26501

RE: Docket No. GMCB-006-20con, Divided Sky Foundation and Ascension Recovery Services, Proposed Development of a Substance Use Disorder Treatment Facility in Ludlow. Project Cost: \$4,390,326.

Dear Ms. Dibiasio:

Thank you for the response to the third set of questions for the above-referenced project. To review and evaluate the proposed project, we need to have a much more detailed description of all aspects of the project including the programmatic, clinical, staffing components, data supporting the need for a ASAM 3.5 and 3.7 residential program given the proposed service area, and potential impact of the proposed program on Vermont's existing preferred-provider residential care substance use disorder (SUD) treatment programs (ASAM 3.5, 3.7) and ASAM 3.1 outpatient treatment. The application and responses to questions have not provided sufficient detail in several areas. This set of questions focuses on several areas where much further explanation and detail is required for the Board to evaluate the project. Please be advised that as the detail of your project evolves, we will need all financial tables revised to reflect any changes. The burden of proof to adequately address these questions is on the applicant. At this time, please provide the following information:

Service Area

1. In the application and in your response to Q001, page 18, you indicate that your service area is Windsor County and in your response to the first set of questions, you indicate that roughly 60% of the program participants will be Vermonters and 40% will be from out-of-state.
 - a. Please specify what comprises your target service area(s) (primary, secondary and tertiary).
 - b. Specifically list all states and/or regions of the U.S. and Canada from which Divided Sky will market and draw potential participants from for the program.



- c. For individuals coming in from out-of-state, provide the percent you estimate that will seek needed continued treatment in their home states, relative to the percentage of out-of-state residents who may seek to relocate to Vermont and seek continued long-term services here.
 - i. Please address the concern that this dynamic would place pressure on Vermont's existing community-based system of care which it may not be able to absorb.

Clinical/Program

2. You have represented that Divided Sky will offer three programs: Stabilization/Withdrawal Management; Residential Substance Use Disorder Treatment; and After Care Services. In a table format, provide the following information for each program:
 - a. Each service that will be offered in each of the three programs;
 - b. The number of hours weekly each client will spend in each clinical service and non-clinical activity;
 - c. The average number of days (length of stay) a participants will be in each program; and
 - d. The day when discharge planning activities will be initiated.
3. Please provide the following information regarding the proposed After Care Services that will be provided to a discharged individual remotely via telehealth by a counselor located at the Ludlow facility.
 - a. Provide in detail the process from the initiation of discharge planning activities through and beyond discharge.
 - b. Describe how Divided Sky will assure that the full range of all needed services for each individual are in place by the date of discharge.
 - c. Explain in much more detail the purpose of After Care Services.
 - d. Address the concern that individuals should be fully transitioned back into their communities with the full range of local placements by the day they are discharged from Divided Sky to assure continuity of care for continued recovery.
 - i. Explain whether and how this transition will differ for Vermont residents and for out-of-state residents.
 - e. Explain how Divided Sky's proposed After Care Services will not conflict with the stated plan to work with existing programs and providers to establish long-term placements for individuals discharged from Divided Sky.
4. Clarify what the projected average length of stay will be at Divided Sky. Following your stated average length of stay at Divided Sky, explain in detail how the needs of longer-term treatment programming (residential and out-patient programs) will be accommodated at Divided Sky or through referrals to other programs.
5. Explain whether Divided Sky will provide separate clinical programming and living areas for men and women. Specify and detail any gender specific difference in programming.



6. Please explain in detail why CBT is not listed as a therapy to be used in Divided Sky's clinical programming.
7. The applicant notes it will provide services to people with co-occurring SUD and mental health disorders, but there does not appear to be staffing descriptions for psychiatric and mental health services provided and whether those costs are represented the financial tables submitted to date. Explain in detail how mental health and psychiatric services will be provided to individuals while at Divided Sky and how they will be billed to payers.
8. Describe in detail how Divided Sky will assess clients for suicidality and suicide risk and how they will treat individuals with identified suicidality and suicide risk.
9. Describe how Divided Sky will act as a referral source to other existing residential programs and how Divided Sky will receive referrals from other existing residential programs to ensure timely and coordinated care for Vermonters without duplication of needed services. Explicitly address procedures when an individual calls for care and there are no available beds at Divided Sky.
10. Provide a detailed list of where Divided Sky expects to get referrals from and describe the extent to which you will work with Vermont and out-of-state hospitals for referrals based on individuals presenting in hospital emergency departments. Explain the contact you have initiated to date with Vermont hospital emergency departments.
11. The applicant has represented that its 10 detoxification beds (ASAM 3.7) will be fully occupied from the first day of operation. Explain how the applicant proposes to keep beds at 100% capacity from day one, for the first three years of operation. If this assumption is inaccurate, please explain as this would also affect financial tables submitted to date.
12. Demonstrate your understanding of Vermont's health care system and of local, regional and statewide SUD programs and supports across the continuum and specify the existing networks of programs. Detail your understanding of the existing Preferred Provider network for substance use disorder, including Hubs and Spoke. Describe in detail how you will approach establishing partnerships with existing programs and services.
13. Assuming Divided Sky will accept referrals statewide, explain in detail how you will build referral pathways with local, primary, and specialty care providers.
14. In a table format, provide a summary of the ASAM 3.5 and 3.7 residential facilities that Ascension currently operates, owns and/or manages the programming for these levels of care; specify the names of the facilities, the location of each, and number of ASAM 3.5 and 3.7 level licensed beds, and specific services offered at each; date Ascension became involved in each; level of Ascension's current involvement and role/responsibilities in



each; capacity vs. occupancy rate for both ASAM 3.5 and 3.7 levels for 2019 and 2020; total revenue for each facility in 2019 and 2020.

15. Confirm the lab(s) where toxicology tests will be sent and analyzed and the entity that owns and/or operates the lab(s) to be used and relationship to Ascension and Divided Sky.
16. Provide an update on the status of licensing the 40 beds with the Division of Licensing and Protection.
17. Provide an update on discussions you have had with Rutland Regional Medical Center and/or Springfield Hospital for transfer of individuals experiencing a physical or mental health crisis while in treatment at Divided Sky.
18. Provide an update on discussions you have had with ambulance services for transport of individuals experiencing a physical or mental health crisis while in treatment at Divided Sky.

Staffing

19. Vermont is experiencing serious existing workforce challenge. Explain in detail your strategy for recruitment and retention. Include how Divided Sky will avoid recruiting staff from existing providers that would cause a negative impact.

Need for the Project

20. In Vermont, specialty residential SUD services are not physically located in each county. Provide the standard for specialty care accessibility to support the assertion that the existing residential SUD facility's proximity is insufficient. Provide data that takes into consideration the proximity to the existing facility in Wallingford offering identical services to those proposed by Divided Sky as well as the facilities in Vergennes and Bradford to support the need for a new 30-bed residential SUD treatment facility in Ludlow.
21. Provide a detailed response to required HRAP Standard 1.3 which requires the applicant to demonstrate that a collaborative approach to delivering the service has been taken or is not feasible with "neighboring facilities" providing the same level of services proposed by Divided Sky. In your response specifically address contacts you have made with Vermont's existing ASAM 3.5 and 3.7 facilities and efforts made to collaborate with them on programming offered and not duplicate needed services.



22. See response to Q001, 7/23/2021, 16: Provide a detailed response to required HRAP Standard 1.4 specifically addressing the potential impact on existing ASAM 3.5 and 3.7 facilities located in Wallingford, Bradford, and Vergennes.
23. Page 11: It is stated that the proposed facility and programming balances community and statewide need. Explain in detail how the proposed facility and programming balances community and statewide needs, including addressing the close proximity to an existing residential SUD treatment program providing identical services to those proposed and impact on lack of sufficient qualified work force.
24. Page 12: It is stated that there is growing recognition of the importance of stable and safe living environments to the process of recovery for people with SUD who are in need of structured care. Explain how the need for safe and stable living environment supports the need for short-term residential treatment program proposed at Divided Sky is needed instead of recovery housing or other living environment alternatives such as permanent supported housing, transitional housing, and independent living.
25. Page 11: Describe how the referenced 2018 State Health Needs Assessment justifies the need specifically for additional residential SUD treatment beds. Include the breakdown of individuals in Vermont in need of treatment, data detailing the percentage of individuals in need of treatment who recognize a need for and would accept treatment, and the percentage of those individuals who recognize a need and would accept treatment and the percentage of those individuals who are in need of residential versus other treatment levels.

Electronic Medical Record

26. Confirm the specific Electronic Medical Record (EMR) system that Divided Sky will utilize. (See response to Q001, 7/23/2021, 15.) Address in detail interoperability [connecting the data from Divided Sky's electronic health record system to the state's health data repository to support coordination of care using the Vermont Health Information Exchange (HIE)]. Describe in detail if and how Divided Sky's plan to electronically exchange health records with other providers outside of your facility and how you will access health records of their patients to support care delivery at Divided Sky. Also confirm that all costs to be compliant with Vermont's HIE are included in the revised financial tables you submitted on January 10, 2022.

Explain in more detail the EMR system Divided Sky intends to use, and the costs associated with the system in Year 1, 2, and 3. Confirm whether these costs are represented in the financial tables submitted to date.



In responding, restate the question in bold font and respond in un-bolded font. Send an electronic copy to me at donna.jerry@vermont.gov and one hard copy (three-hole punched) with a Verification Under Oath to my attention at the Green Mountain Care Board, 144 State Street, Montpelier, Vermont 05602.

If you have any questions, please do not hesitate to contact me at 802-760-8162.

Sincerely,

s/ Donna Jerry

Senior Health Policy Analyst
Green Mountain Care Board

cc. Laura Beliveau
Staff Attorney

